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Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

UNITED STATES OF AMERICA,

No. 3:20-cr-00497-BR

Plaintiff,

v.

**MOTION TO AMEND
ORDER SETTING
CONDITIONS OF RELEASE**

JEFFREY RICHARD SINGER,

Defendant.

Jeffrey Richard Singer, Defendant in the above-entitled case, through counsel, Francesca Freccero, moves to amend the order setting the conditions of release entered in this case on October 21, 2020, to permit Mr. Singer's curfew hours to be set in the discretion of the supervising Pretrial Officer. The Order was signed by the Honorable Youlee Yim You, U.S. Magistrate Judge.

On October 21, 2020, Mr. Singer was released pretrial subject to certain conditions, including that he comply with a curfew from 8:30 p.m. to 6:30 a.m. According to Pretrial Officer Rachel Lindberg, since his release from custody on October 21, 2020, Mr. Singer has complied with all terms of the order setting the conditions of his release. Mr. Singer is now working full time and may pursue job opportunities that will make his compliance with current curfew requirements more difficult. Because his compliance for two and a half months demonstrates that the early curfew is not necessary to ensure his lawful behavior while on release, he moves to have the specific curfew hours be changed and set in the discretion of the supervising pretrial officer.

Pretrial Officer Rachel Lindberg does not object. Undersigned counsel contacted government counsel, Thomas Ratcliffe, by email communication on January 7, 2021. As of the filing of this Motion, undersigned counsel has not learned the government's position on the instant motion.

Respectfully submitted this 8th day of January, 2021.

/s/ Francesca Freccero
Francesca Freccero
Assistant Federal Public Defender